## Exhibit 1

## Privilege Log

Kerrikkattil v. Hrabowski, et al.

**USDC** 

Case No.: WMN-13-02016

As of April 21, 2014

Bates	Document	From	То	CC:	Reason For
Numbers	Description	David Gleason			Privilege
DEF 126	Email	David Gleason	Paul Dillon		Attorney Client
DEF 127	Email	David Gleason	Paul Dillon		Privilege Attorney Client
DEF 127	Email	David Gleason	Paul Dillon		Privilege
			Christopher		Attorney Client
DEE 522	Email	Ginny Kellman	Tkacik		Privilege
DEF 522	Elliali	Gilliy Kellillali	Ginny		Attorney Client
			Kellman, Jeff		Privilege
			Cullen, Student		Tilvilege
		Christopher	Judicial		
DEF 526	Email	Tkacik	Program		
DEI 320	Linan	1 Rucik	Christopher	David Gleason,	Attorney Client
DEF 538 - 545	Email	Jeff Cullen	Tkacik	Nancy Young	Privilege
DEL 220 - 242	Linan	Christopher	racia	Trailey Toung	Attorney Client
DEF 759	Email	Tkacik	Jeff Cullen	Ginny Kellman	Privilege
DEI 137	Linaii	IRACIR	Christopher	David Gleason,	Attorney Client
DEF 871 - 878	Email	Jeff Cullen	Tkacik	Nancy Young	Privilege
DEI 6/1 - 6/6	Liman	Christopher	TRUCK	Trainey Touring	Attorney Client
DEF 1107	Email	Tkacik	Jeff Cullen	Ginny Kellman	Privilege
DLI 1107	Zinaii	- I HUOIN			Attorney Client
DEF 1130	Email	Jeff Cullen	Davonya Hall		Privilege
	231141.		Ranjith		Attorney Client
DEF 1132	Email	Davonya Hall	Keerikkattil		Privilege
			Davonya Hall,		
			Christopher		Attorney Client
DEF 1133	Email	Jack Suess	Tkacik		Privilege
DEF 1133 -		Christopher	Jack Suess,		Attorney Client
1134	Email	Tkacik	Davonya Hall		Privilege
DEF 1167 -			Christopher		Attorney Client
1170	Email	Jeff Cullen	Tkacik		Privilege
DEF 1180 -			Christopher		Attorney Client
1197	Email	Susan Mcguire	Tkacik		Privilege
			Kim Leisey,		-
			Nancy Young,		
DEF 1202 -		Christopher	Paul Dillon,		Attorney Client
1205	Email	Tkacik	Jeff Cullen		Privilege
DEF 1268 -		Christopher			Attorney Client
1270	Email	Tkacik	Paul Dillon		Privilege

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DEF 1513-	Sanction letters	Jeff Cullen,	Students		FERPA
1592	to Students	Davonya Hall	<del> </del>		
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DEF 1593-	Student				
1596	Misconduct				FERPA
DEF 1597-	<del>-</del> .,	T 60 0 11	1,	Kim Leisey	TEN D
1599	Email	Jeff Cullen	Nancy Young		FERPA
DEF 1600-	Paul Dillon				
1707	phone Records		ļ <u> </u>		Beyond scope
DEF 1708-	- I	7. 7.	0. 1	ŀ	EED D A
1709	Email	Kim Leisey	Student		FERPA
DEF 1710	Email	Paul Dillon	Student		FERPA
DEF 1712	Email	Paul Dillon	Student		FERPA
DEF 1714	Email	Paul Dillon	Student		FERPA
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DEF 1719	Board	Kim Leisey	Students		FERPA
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	Student	B 1531			
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DEF 1721	Board	Kim Leisey	Students		FERPA
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	Student	D 10'11			
DEE 1933	Advisory	Paul Dillon;	C. I.		CCDDA
DEF 1723	Board	Kim Leisey	Students		FERPA
	Email re:				
	Student	D 10:31			
222.55	Advisory	Paul Dillon;	0. 1		EEDDA
DEF 1759	Board	Kim Leisey	Students		FERPA
	Email re:				
	Student	5 152			
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DEF 1761	Board	Kim Leisey	Students		FERPA
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DEE 1760	Student	B 15'11			
DEF 1762-	Advisory	Paul Dillon;	C		FEDDA
1763	Board	Kim Leisey	Students		FERPA
İ	Email re:				
DEE 1244	Student	David Dilli			
DEF 1766-	Advisory	Paul Dillon;	Students		FERPA
1767	Board	Kim Leisey	Students		FERFA
	Email re:				
DEE 1770	Student	Doul Dillon.			
DEF 1770-	Advisory	Paul Dillon;	Students		FERPA
1771	Board	Kim Leisey	Students		TENIA
	Email re:				
	Student	   David Dillom			
DEE 1276	Advisory	Paul Dillon;	Studente		FERPA
DEF 1775	Board	Kim Leisey	Students		FERFA

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Email re:			
	]		:
	Paul Dillon;		
Board	Kim Leisey	Students	FERPA
Student			
Advocate List	<u></u> .		FERPA
Student			
Advocate			
Small Group			
Meeting			
			FERPA
UMBC Student			
Incident			
Reports			FERPA
Letter	Jeff Cullen	Student	FERPA
De/Keerikkattil			
Police Report			FERPA
CAD Police			
Reports			FERPA
Sanction letters	Jeff Cullen	Students	FERPA
Rule 2 Ltr			
(2006)			Beyond Scope
Sanction			
Letters	Jeff Cullen	Students	FERPA
Sanction			
Letters	Jeff Cullen	Students	FERPA
Email	Kim Leisey	Student	FERPA
Sanction	,		
Letters	Jeff Cullen	Students	FERPA
Paul Dillon			
Resume			Beyond scope
Student			
Applications		1	FERPA
	Student Advocate List Student Advocate Small Group Meeting Outline UMBC Student Incident Reports Letter De/Keerikkattil Police Report UMBC Full CAD Police Reports  Sanction letters Rule 2 Ltr (2006) Sanction Letters Sanction Letters Email Sanction Letters Paul Dillon Resume Student Hearing Board	Student Advisory Board Student Advocate List Student Advocate Small Group Meeting Outline  UMBC Student Incident Reports Letter Jeff Cullen  De/Keerikkattil Police Report  UMBC Full CAD Police Reports  Sanction letters Fulle 2 Ltr (2006) Sanction Letters Jeff Cullen  Sanction Letters Jeff Cullen  Sanction Letters Jeff Cullen  Email Kim Leisey  Sanction Letters Jeff Cullen  Email Kim Leisey  Sanction Letters Jeff Cullen	Student Advisory Board Kim Leisey Students Student Advocate List Student Advocate Small Group Meeting Outline UMBC Student Incident Reports Letter Jeff Cullen Student CAD Police Reports  Sanction letters Rule 2 Ltr (2006) Sanction Letters Jeff Cullen Students Students Students Sanction Letters Jeff Cullen Students Student Students Students Students Student Paul Dillon Resume Student Hearing Board



Ranjith Keerikkattil <rkeerikkattil@gmail.com>

## privilege log issues

Delfosse, Erik <edelfosse@oag.state.md.us>

Sun, May 4, 2014 at 1:53 AM

To: Ranjith Keerikkattil <rkeerikkattil@gmail.com>

Cc: pdillon <pdillon@umbc.edu>, Jeff Cullen <jcullen@umbc.edu>, "Dodge, Maria" <mdodge@oag.state.md.us>,

David Gleason <gleason@umbc.edu>

Dear Mr. Keerikkattil.

I am getting back to you as previously indicated.

Attached is the updated privilege log. I have reviewed it and believe certain corrections, additional disclosures and explanations are necessary.

- 1. DEF 000126 127: The documents are mislabeled on the privilege list and will be produced.
- 2. DEF 000130! This document will be produced in redacted form as it contains unprivileged documents. The redacted portion will be withheld under the attorney client privilege.
- 3. DEF 000132. This document was an email chain produced in redacted form and all redactions were made subject to the attorney client privilege.

For all documents withheld pursuant to the attorney/client privilege, the documents contain communications from one or more individuals within UMBC's general counsel's office to employees of UMBC or the Board of Regents and contain advice on matters and facts relating to this case.

In addition to the above, certain documentation was withheld because it exceeded the scope of the agreed upon discovery:

1. DEF 001600-1707, 002949: The personal identifying information of Mr. Dillon's phone records and resume was redacted as beyond the scope of the agreed upon discovery.

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2. DEF 02164-2167: This document is a Rule 2 letter from 2006 that is beyond the scope of the agreed upon discovery.

All documents being withheld pursuant to FERPA contain personally identifying information and is being withheld pursuant to the discretion set forth in the statute. For the documents in question, the withholding is either mandatory or permissive under that statute.

Erik James Delfosse

Senior Counsel, Litigation

Educational Affairs Division

Office of the Attorney General

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Baltimore, Maryland 21202-2021

(410) 576-6412

Privilege Log Complete.docx